

Subject: Exide Closure - **Notice of Violation Issued by DTSC and SCAQMD**

Dear Member of the Exide Technologies Advisory Group:

We are writing to notify you about an incident that recently took place during the Exide facility closure. The incident is similar to the one we discussed during the December 10, 2019, Advisory Group Meeting. We want to keep you informed and answer any questions you may have.

Incident Summary

On December 26, 2019, the heavy plastic sheeting covering the full enclosure unit (FEU) ripped during a high wind event (see Figure 1). The incident did not result in exceedances of lead or arsenic air quality standards (see Figure 2), measured at the facility perimeter as specified in Exide's South Coast Air Quality Management District (SCAQMD) Title V permit or the DTSC approved-Closure Plan. However, DTSC is issuing a Notice of Violation to Exide today for not maintaining the required vacuum in a small portion of the full enclosure unit for approximately two hours (see Figure 3). Exide responded to the incident and completed repairs the same day (See Figure 4).

Additional Background

A similar incident occurred on February 17, 2019. In response to the February 17, 2019, incident SCAQMD issued a notice of violation to Exide on March 15, 2019, as discussed in previous public and Advisory Group meetings (March 19 and December 10) and an email newsletter (June 25). Exide adjusted their FEU design and procedures in response to the February 17, 2019, incident.

Next Steps

DTSC and SCAQMD are investigating both incidents and evaluating additional upgrades to prevent reoccurrence.

- More information about DTSC's Notice of Violation can be found here:
https://www.hwmpenvirostor.dtsc.ca.gov/public/site_documents/4122556388/2020-01-07_Notice%20of%20Violation%20FEU%20Tear%20Incidents_Final.pdf
- More information about SCAQMD's Notice of Violation can be found here:
<https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=124838>



Figure 1: Aerial photo at approximately 7:00 a.m. December 26, 2019, showing the approximately 35-foot by 20-foot triangular FEU tear. The photo is facing south.

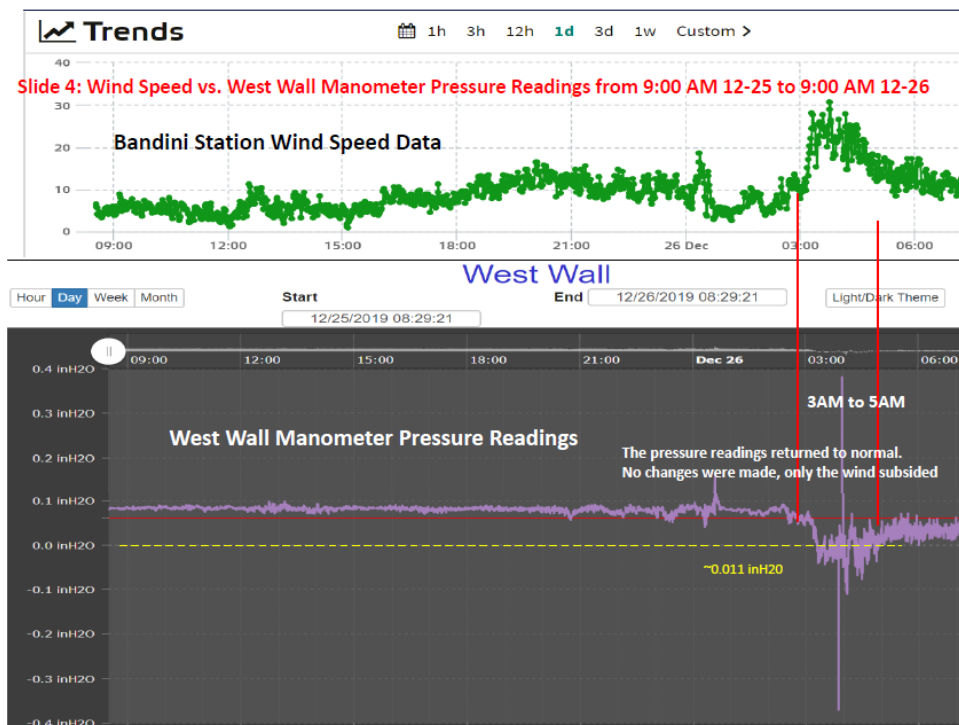


Figure 2: West Wall manometer pressure readings showing erratic negative pressure that corresponds with high winds between approximately 3:00 and 5:00 a.m.



Figure 3: Aerial photo at approximately 12:30 p.m. December 26, 2019, showing the area of the FEU that was repaired. The photo is facing south.